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Attorneys for Amor IX, LLC

## BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

Application of Rocky Mountain Power for Approval of the Renewable Energy Contract between PacifiCorp and the University of Utah and the Related Agreement with Amor IX, LLC

DOCKET NO. 18-035-08

## PETITION TO INTERVENE OF AMOR IX, LLC

Amor IX, LLC ("Amor") petitions the Public Service Commission of Utah ("Commission") for intervention in the above-entitled proceeding pursuant to Utah Code Ann. § 63G-04-207 and Utah Admin. Code R746-1-108.

In support of this Petition to Intervene, Amor states as follows:

- 1. On April 6, 2018, the Commission issued the Scheduling Order and Notice of Hearing and set a deadline of May 8, 2018 for petitions for intervention by parties that wish to participate in this proceeding.
- Amor, whose headquarters are at 136 South Main Street, Salt Lake City, Utah 84101, plans to construct, own, operate and maintain a geothermal electric generating facility located in Churchill County, Nevada.
- 3. Amor has entered into the Renewable Resource Contract (Schedule 32) with PacifiCorp which is being reviewed by the Commission in this proceeding.
- 4. Amor has a significant interest in this proceeding and its legal rights or interests may be substantially affected by the outcome.

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5. Amor's intervention and participation in this matter will not materially impair the prompt

and orderly conduct of these proceedings.

6. Amor's interests are not adequately represented by another party in this proceeding.

7. Amor requests that copies of all notices and filings in this docket be served on:

Brian W. Burnett. Esq. KIRTON MCCONKIE 50 East South Temple, Suite 400 Salt Lake City, Utah 84111 bburnett@kmclaw.com

Nicholas Goodman
John Perry
Scott Rhees
Amor IX, LLC
136 South Main Street, Suite 600
Salt Lake City, UT 84111
nick.goodman@cyrqenergy.com
john.perry@cyrqenergy.com
scott.rhees@cyrqenergy.com

Please serve all documents electronically whenever possible.

NOW THEREFORE, Amor respectfully requests that the Commission enter an Order granting Amor's Petition to Intervene in this docket allowing Amor to participate to the fullest extent allowed by law.

Dated this 8<sup>th</sup> day of May, 2018.

KIRTON MCCONKIE

/s/ Brian W. Burnett

Brian W. Burnett

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## **Certificate of Service**

I hereby certify that on May 8, 2018, I caused a true and correct copy of the foregoing Petition to Intervene of Amor IX, LLC to be emailed to the following:

Public Service Commission of Utah (psc@utah.gov)

Data Request Response Center (<u>datarequest@pacificorp.com</u>, <u>utahdockets@pacificorp.com</u>)
PacifiCorp

Jeff Richards (jeff.richards@pacificorp.com)
Joe Paul (joe.paul@pacificorp.com)
Jana Saba (jana.saba@pacificorp.com)
Yvonne Hogle (yvonne.hogle@pacificorp.com)
Rocky Mountain Power

Patricia Schmid (<u>pschmid@agutah.gov</u>) Justin Jetter (<u>jjetter@agutah.gov</u>) Robert Moore (<u>rmoore@agutah.gov</u>) Steven Snarr (<u>stevensnarr@agutah.gov</u>) Assistant Utah Attorneys General

Chris Parker (<a href="mailto:chrisparker@utah.gov">chrisparker@utah.gov</a>)
William Powell (<a href="mailto:wpowell@utah.gov">wpowell@utah.gov</a>)
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Division of Public Utilities

Michele Beck (<a href="mailto:mbeck@utah.gov">mbeck@utah.gov</a>)
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Scott Rhees (<a href="mailto:scott.rhees@cyrqenergy.com">scott.rhees@cyrqenergy.com</a>)
Amor IX, LLC

/s/ Brian W. Burnett

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